

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SONTERRA CAPITAL MASTER FUND, LTD.,	:	
HAYMAN CAPITAL MANAGEMENT, L.P., AND	:	
CALIFORNIA STATE TEACHERS' RETIREMENT	:	
SYSTEM, on behalf of themselves and all others	:	
similarly situated,	:	
Plaintiffs,	:	DOCKET NO. 15-cv-05844-GBD
v.	:	
UBS AG, UBS SECURITIES JAPAN CO. LTD.,	:	
MIZUHO BANK, LTD., THE BANK OF TOKYO-	:	
MITSUBISHI UFJ, LTD., THE SUMITOMO TRUST	:	
AND BANKING CO., LTD., THE NORINCHUKIN	:	
BANK, MITSUBISHI UFJ TRUST AND BANKING	:	
CORPORATION, SUMITOMO MITSUI BANKING	:	
CORPORATION, RESONA BANK, LTD., J.P.	:	
MORGAN CHASE & CO., JPMORGAN CHASE	:	
BANK, NATIONAL ASSOCIATION, J.P. MORGAN	:	
SECURITIES PLC, MIZUHO CORPORATE BANK,	:	
LTD., DEUTSCHE BANK AG, DB GROUP	:	
SERVICES UK LIMITED, MIZUHO TRUST AND	:	
BANKING CO., LTD., THE SHOKO CHUKIN	:	
BANK, LTD., SHINKIN CENTRAL BANK, THE	:	
BANK OF YOKOHAMA, LTD., SOCIÉTÉ	:	
GÉNÉRALE SA, THE ROYAL BANK OF	:	
SCOTLAND GROUP PLC, THE ROYAL BANK OF	:	
SCOTLAND PLC, RBS SECURITIES JAPAN	:	
LIMITED, RBS SECURITIES INC., BARCLAYS	:	
BANK PLC, BARCLAYS PLC, BARCLAYS	:	
CAPITAL INC., CITIBANK, NA, CITIGROUP, INC.,	:	
CITIBANK, JAPAN LTD., CITIGROUP GLOBAL	:	
MARKETS JAPAN, INC., COÖPERATIEVE	:	
CENTRALE RAIFFEISEN-BOERENLEENBANK	:	
B.A., HSBC HOLDINGS PLC, HSBC BANK PLC,	:	
LLOYDS BANKING GROUP PLC, LLOYDS BANK	:	
PLC, ICAP PLC, ICAP EUROPE LIMITED, R.P.	:	
MARTIN HOLDINGS LIMITED, MARTIN	:	
BROKERS (UK) LTD., TULLETT PREBON PLC,	:	
BANK OF AMERICA CORPORATION, BANK OF	:	
AMERICA, N.A., MERRILL LYNCH	:	
INTERNATIONAL, AND JOHN DOES NOS. 1-50,	:	
Defendants.	:	

**DECLARATION OF REBECCA K. SMITH IN SUPPORT OF  
J.P. MORGAN SECURITIES PLC's MOTION TO DISMISS FOR  
LACK OF PERSONAL JURISDICTION**

I, Rebecca K. Smith, hereby declare:

1. I am an Executive Director and Assistant General Counsel of JPMorgan Chase Bank, N.A., London Branch. I submit this declaration in further support of the motion to dismiss the above captioned action for lack of personal jurisdiction of J.P. Morgan Securities plc (p/k/a J.P. Morgan Securities Ltd.) ("JPMS plc"). I have personal knowledge of the facts set forth herein based on my work at JPMS plc and my review of relevant records.

2. JPMS plc is a financial institution incorporated under the laws of England and Wales. During the time period January 2006 to end of June 2011, JPMS had its headquarters located at 125 London Wall, London EC2Y 5AJ. Since July 2012, its headquarters are and have been located at 25 Bank Street, Canary Wharf, London E14 5JP. JPMS plc's principal place of business is and has been in London, England.

3. JPMS plc did not have any branches, offices, or employees in the United States from January 2006 to end of June 2011.

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: London, England  
January 26, 2016



Rebecca K. Smith  
Executive Director and Assistant General Counsel  
JPMorgan Chase Bank, N.A., London Branch